

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ORIGINAL
ILLINOIS
COMMERCE COMMISSION
APR 6 1 10 PM '01
CHIEF CLERK'S OFFICE

ILLINOIS COMMERCE COMMISSION
ON ITS OWN MOTION

vs.

ST. ANDREWS TELECOMMUNICATIONS, L.L.C.

Citation for failure to file Annual Report

01-0163

BRIEF ON EXCEPTIONS

COMES NOW the Respondent, St. Andrews Telecommunications, L.L.C., and hereby respectfully requests that the Hearing Examiner's Proposed Order herein dated February 15, 2001 revoking the Respondent's Certificate of Service Authority be set aside. In support of its request Respondent would show the Commission the following, to wit:

1. On October 30, 1999 Respondent's counsel's office was destroyed by fire.
2. Many of Respondent's records and files in its counsel's office were destroyed or severely damaged by smoke and water, which included correspondence and reporting forms from the Illinois Commerce Commission.
3. Respondent's counsel has been overwhelmed in the effort to reconstruct many of Respondent's records and in the process apparently failed to timely comply with Illinois' filing requirements.

4. In addition, in September, 2000 Respondent physically relocated its business office from 1611 St. Andrews Drive, Lawrence, KS to 1915 W. 24th St., Lawrence, KS.

5. It has come to Respondent's attention recently that several critical items of correspondence addressed to Respondent's former address were not forwarded to Respondent at its new address.

6. Respondent recognizes that none of the above excuses its failure to comply with Illinois Commerce Commission filing requirements and offers the foregoing information only to explain how Respondent came to be in the present circumstances.

7. Respondent sincerely apologizes to the Commission for its failures heretofore and extends its assurances to the Commission that it will redouble its efforts to timely comply with future Commission filing requirements.

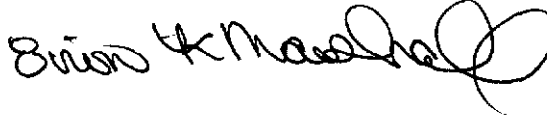
8. Respondent has completed and filed the ICC – PUC Annual Gross Revenue Return for the Period 01/01/99 through 12/31/99. A copy of the return is attached hereto.

9. Respondent did not owe any tax due to the de minimis revenues generated by Respondent in Illinois during the period covered by the return.

WHEREFORE, Respondent respectfully requests that the Commission set aside the Hearing Examiner's Proposed Order herein dated February 15, 2001 revoking the Respondent's Certificate of Service Authority and permit Respondent to continue providing service in Illinois.

Respectfully submitted,

ST. ANDREWS TELECOMMUNICATIONS, L.L.C.

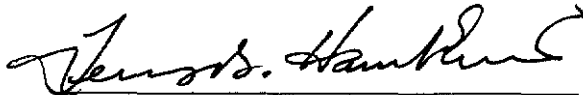


Erin K. Marshall, Director of Operations

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th day of April, 2001 a true and correct copy of the foregoing **BRIEF ON EXCEPTIONS** was deposited in the United States Mail, First Class Postage Pre-paid, addressed to:

Conrad S. Rubinkowski
Office of General Counsel
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701



Terry D. Hamblin